



April 7, 2017

State Water Resources Control Board  
Felicia Marcus, Chair  
P.O. Box 100  
Sacramento, CA 95812-0100



Re: 1,2,3-Trichloropropane Maximum Contaminant Level Standard

Dear Chairwoman Marcus and Board:

As practitioners that provide technical assistance to rural drinking water systems in the San Joaquin Valley and throughout the state, Rural Community Assistance Corporation (RCAC) and Self-Help Enterprises (SHE) support adoption of the State Water Resources Control Board's proposed 5 part per trillion maximum contaminant level (MCL) for 1,2,3-trichloropropane (123 TCP). We support the proposed standard because it will protect the residents' health in the communities we serve, but we are concerned that compliance costs will impact drinking water affordability for consumers served by small water systems. We therefore urge the Board to provide additional assistance to rural, low-income communities to help them comply with the standard.

The communities we serve are disproportionately impacted by the prevalence of 123 TCP in their water supplies, and they often lack adequate resources to comply with existing drinking water standards. Small water systems lack economies of scale that help spread compliance costs among a large ratepayer base and therefore charge some of the highest water rates in the state. They are often unable to find or afford water operators who are certified at the grade necessary to oversee proper treatment and distribution that is needed to provide safe water.

While the adoption of the proposed 123 TCP standard will protect public health, it will also impose additional costs on small water systems. Even if many systems can obtain some relief through the courts, there will be significant capital outlays to build treatment facilities to remove 123 TCP, and ongoing operations and maintenance costs in perpetuity. To help offset the costs and to protect public health to the maximum extent possible, the SWRCB should dedicate additional technical assistance, training and grant funding to communities impacted by the regulation. The resources should be deployed to build the capacity of communities and small utilities to help them comply while keeping rates affordable.

Access to affordable, safe water is essential to build community, improve local economies, create jobs and reduce poverty. The proposed MCL for 123 TCP, when coupled with additional resources to help disadvantaged communities comply, will protect public health while keeping rates affordable.

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Thank you for the opportunity to provide these comments and for your consideration. If you have any questions, please feel free to contact Ari Neumann, Assistant Director, Community & Environmental Services, [aneumann@rcac.org](mailto:aneumann@rcac.org), or (916) 588-0112.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stanley Keasling".

Stanley Keasling  
CEO, Rural Community Assistance Corporation

A handwritten signature in blue ink, appearing to read "Tom Collishaw".

Tom Collishaw  
President/CEO, Self Help Enterprises